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MOTOROLA SOLUTIONS, INC.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

EON CORP. IP HOLDINGS, LLC,

Plaintiff,

v.

SENSUS USA INC.; et al,

Defendants.

Case No. C12-01011 JST (EDL)

**SECOND JOINT STIPULATION TO
EXTEND DEADLINES RE EON CORP.
IP HOLDINGS, LLC'S MOTION TO
COMPEL MOTOROLA SOLUTIONS,
INC. TO PRODUCE DOCUMENTS AND
THINGS**

AND RELATED COUNTERCLAIMS

SECOND JOINT STIPULATION TO EXTEND DEADLINES RE EON CORP. IP
HOLDINGS, LLC'S MOTION TO COMPEL MOTOROLA SOLUTIONS, INC. TO
PRODUCE DOCUMENTS AND THINGS
CASE NO. C12-01011 JST (EDL)



1 Plaintiff EON Corp. IP Holdings LLC (“EON”) and Defendant Motorola Solutions Inc.
2 (“MSI”) hereby stipulate and agree as follows:

3 WHEREAS EON filed a Motion to Compel MSI to Produce Documents and Things (Dkt.
4 No. 876) on November 26, 2013,

5 WHEREAS EON and MSI previously stipulated to extend the deadlines relating to EON’s
6 Motion to Compel pending finalization of settlement terms,

7 WHEREAS the Court granted EON and MSI’s prior Stipulated Request on December 10,
8 2013 (Dkt. No. 890),

9 WHEREAS MSI’s Opposition to EON’s Motion to Compel is currently due on January 14,
10 2014,

11 WHEREAS EON’s Reply in further support of its Motion to Compel is currently due on
12 January 21, 2014,

13 WHEREAS the hearing for the Motion to Compel is currently scheduled for February 11,
14 2014 at 2:00 p.m.,

15 WHEREAS EON and MSI reached a tentative settlement in principle during a conference
16 with Magistrate Judge Spero,

17 WHEREAS EON and MSI are continuing to finalize settlement terms, and continue to
18 agree in the interest of judicial economy and the preservation of time to extend the deadlines
19 relating to EON’s Motion to Compel pending finalization of settlement terms, after which this
20 action will be dismissed as to MSI,

21 WHEREAS the Court has previously granted in part four Motions to Shorten Time relating
22 to other Motions to Compel (Dkt. Nos. 802, 807, 814, 869), and granted two Stipulated Requests
23 for an Extension of Time for Close of Fact Discovery and Expert Reports (Dkt. Nos. 872, 890),

24 NOW, THEREFORE, the parties, by and through their respective counsel of record, hereby
25 stipulate and respectfully request that the Court issue an order under Civil L.R. 6-2(a) postponing
26 the briefing deadlines with respect to EON’s Motion to Compel MSI to Produce Documents and
27 Things (Dkt. No. 876), such that:



(1) MSI's Opposition to EON's pending Motion to Compel shall be filed no later than February 11, 2014,

(2) EON's Reply in support of its Motion to Compel shall be filed no later than February 18, 2014, and

(3) The hearing for the Motion to Compel shall be rescheduled to March 11, 2014, or any other day thereafter at the Court's convenience.

DATED: January 13, 2014

Respectfully submitted,

KILPATRICK TOWNSEND & STOCKTON LLP

By: /s/ Byron R. Chin
BYRON R. CHIN

Attorneys for Defendant
MOTOROLA SOLUTIONS, INC.

DATED: January 13, 2014

Respectfully submitted,

By: /s/ John V. Picone

Attorneys for Plaintiff
EON Corp IP Holdings LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED:

DATED: January 14, 2014

Elijah B. D. Laporte
Honorable Elizabeth D. Laporte
U.S.D.C. Magistrate Judge

CERTIFICATION PURSUANT TO L.R. 5-1(i)(3)

Pursuant to Local Rule 5-1(i)(3), I hereby certify that I have obtained the concurrence in the filing of this document from all the signatories for whom a signature is indicated by a “conformed” signature (/s/) within this e-filed document and I have on file records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request.

Executed on January 13, 2014, at San Francisco, California.

/s/ Byron R. Chin

Byron R. Chin

